

X. Policies and Procedures Governing Record Keeping

A. Requirements to Establish and Maintain Service Records

An agency must open and maintain a service record for each individual for whom an application for social services is made and for each recipient of protective services.

Recipient service records shall be treated in accordance with policies governing confidentiality and access to client records as set forth in 10A NCAC 69.

The service record must be updated and documented as necessary to reflect changes in a client's circumstances and to keep all information in the record current.

All changes must be documented in the service record. These include the addition of a service to a client's service plan, termination of service, redetermination of eligibility, changes in the recipient's circumstances that affect his/her need for or use of services, and any action taken by the agency that affects the client's receipt of a service and termination of the recipient's service.
[10A NCAC 71R .0303]

In order to comply with the budgeting, planning and reimbursement requirements of G.S. Chapter 108A and 45 CFR 228.17, each county department of social services shall complete all forms specified and approved by the Department of Health & Human Services.
[10A NCAC 67A .0107]

For certain services (e.g., adoptions, protective services), confidentiality requirements are such that separate case files must be maintained.

Service records include basic data, information necessary for determining eligibility and need for the services, providing case management and complying with documentation requirements set forth in policies governing the program funding source for the specific service(s).

An individual's case file may be maintained separately, maintained in a separate section or may be grouped in a family record provided appropriate documentation of eligibility and service provision is maintained for each individual, and provided confidentiality requirements can be accommodated.

Documentation is required in order to establish a record of changes for the client in the service system, to establish a record for fiscal accountability and to document agency action related to appeals, fair hearings and other legal proceedings.

If changes are documented in the quarterly review, additional documentation is not required. There may be additional service specific documentation requirements for updating recipient service records <http://info.dhhs.state.nc.us/olm/manuals/>.

B. Eligibility Documentation Forms

Use of the Department of Health and Human Services specified and approved forms is required. [10A NCAC 67 .0107]

The Division of Social Services, the Division of Child Development, the Division of Services for the Blind and the Division of Aging and Adult Services make available standardized forms that are designed to address documentation requirements applicable to all of the service programs and funding sources outlined in this Chapter. Standardized forms issued by the Divisions will assure compliance with Federal regulations and State law when the forms are used in accordance with eligibility and service policies and when completed in accordance with form instructions.

C. Narrative Recording

Narrative case recording includes any report, social work assessment or study that is prepared by the social worker or received by the social worker. Such may include summaries of an individual's adjustment and utilization of care outside his/her own home, information prepared for court, summaries prepared for purposes of consultation, etc. Regardless of whether the narrative is in the form of a summary report or in the form of general case dictation, recording should include only that information which contributes to a valid basis for reliable conclusions about the client and his/her situation. Such information should be objective, without prejudice and pertinent to the delivery of services and achievement of goals. Case recording is to help the worker assess the direction of service and provides a basis for the worker's self-evaluation. Additionally, case recording incorporates the worker's reflective thinking and professional judgment about the client and his/her use of services and resources.

Narrative recording serves the following purposes:

supportive documentation of the client's need/lack of need for services;

documentation of the completion of the quarterly review;

assistance to staff in the provision of quality service to an individual client and in identifying unmet needs and gaps in resources;

meeting the needs of supervision and supporting administrative planning; and

achieving more effective practice.

In general, the form and scope of narrative recording is determined by local agency policy. Where there are specific recording requirements with respect to certain services, those are set forth in the specific manuals governing provision of those services. For purposes of optional narrative recording, any locally developed form(s) or procedures may be used.

D. Confidentiality of Records

Recipient service records shall be treated in accordance with policies governing confidentiality and access to client records as set forth in [10A NCAC 69].

Federal Law 42 CFR 431.300 requires states to provide safeguards to restrict the use or disclosure of information concerning Medicaid applicants.

It is unlawful for any person to obtain or disclose any information concerning individuals applying for or receiving public assistance or social services that may be directly or indirectly derived from the client's records. [NCGS 108A-80]

Federal Law 45 CFR 164-512 provides for some exemptions related to confidentiality and the release of information in situations of Adult and Child Protective Services and Guardianship. <http://hipaa.dhhs.state.nc.us/index.html> In addition to these requirements there are service specific confidentiality rules. The service record should be physically safeguarded and agencies need to establish and implement policies that keep service records confidential and safe from unauthorized access.

Become familiar with and follow your agency's release of information protocols. Consult with a supervisor or manager before releasing any information.

E. Retention of Records

Records Retention and Disposition Schedule: County Department of Social Services provides policy and guidelines for record retention. [[http:// www.ah.dcr.state.nc.us/records/default.htm](http://www.ah.dcr.state.nc.us/records/default.htm)].